

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	CASE NO. 21-20055-CMB
)	
JASON D. EDWARDS)	CHAPTER 13
AND CARRIE A. EDWARDS)	
)	
Debtors.)	
~~~~~	)	
ALLY BANK LEASE TRUST - ASSIGNOR	)	<u>Hearing Date: June 4, 2024 2:30 p.m.</u>
TO VEHICLE ASSET UNIVERSAL	)	
LEASING TRUST (A.K.A. "VAULT	)	
TRUST", OR "V.A.U.L. TRUST", OR	)	
"VAULT", OR "V.A.U.L.T.")	)	
	)	<u>Response Deadline: May 17, 2024</u>
Movant,	)	
v.	)	
	)	
JASON D. EDWARDS	)	
AND CARRIE A. EDWARDS,	)	
	)	
Respondents	)	
	)	
RONDA J. WINNECOUR,	)	
Trustee	)	

**NOTICE OF HEARING WITH RESPONSE DEADLINE REGARDING MOTION OF  
ALLY BANK LEASE TRUST - ASSIGNOR TO VEHICLE ASSET UNIVERSAL  
LEASING TRUST (A.K.A. "VAULT TRUST", OR "V.A.U.L. TRUST", OR "VAULT",  
OR "V.A.U.L.T.") FOR RELIEF FROM AUTOMATIC STAY**

TO THE RESPONDENT(S):

You are hereby notified that the Movant seeks an order affecting your rights or property.

You are further instructed to file with the Clerk and serve upon the undersigned attorney for Movant a response to the Motion by no later than May 17, 2024 [seventeen (17) days after the date of service below], in accordance with the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, and the general procedures of the presiding judge as found on the

Court's webpage at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov). If you fail to timely file and serve a written response, an order granting the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled.

***You should take this Notice and the Motion to a lawyer at once.***

A hearing will be held on June 4, 2024 at 2:30 p.m. before Judge Carlota M. Bohm in Courtroom B, 54th Floor, U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219. Unless otherwise ordered, parties may also appear for non-evidentiary matters remotely by utilizing the Zoom video conference platform ("Zoom"). To participate in the hearing via Zoom, use the following link no later than ten (10) minutes prior to your scheduled hearing time: <https://www.zoomgov.com/j/16143800191>. Alternatively, connect with Zoom by using the following Meeting ID: 161 4380 0191. ALL HEARING PARTICIPANTS ARE REQUIRED TO REVIEW AND COMPLY WITH THE ZOOM PROCEDURES, which can be found at: <https://www.pawb.uscourts.gov/sites/default/files/pdfs/cmb-proc-videohrg.pdf>. For questions regarding Zoom connection, contact Judge Bohm's Chambers at 412-644-4328. Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses will be heard. If an evidentiary hearing is required, it will be scheduled by the Court for a later date.

Dated: April 30, 2024

Respectfully submitted,

Orlans PC

/s/ Michael H. Kaliner

Michael H. Kaliner, Esq. PA 28747

200 Eagle Road, Suite 120

Wayne, PA 19087

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mkaliner@orlans.com

Counsel for Ally Bank Lease Trust - Assignor  
to Vehicle Asset Universal Leasing Trust  
(a.k.a. "VAULT TRUST", or "V.A.U.L.  
Trust", or "VAULT", or "V.A.U.L.T.")

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Movant,)	
v.)	
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JASON D. EDWARDS)	
AND CARRIE A. EDWARDS,)	
)	
Respondents)	
)	
RONDA J. WINNECOUR,)	
Trustee)	

CERTIFICATE OF SERVICE

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below on April 30, 2024.

The type of service made on the parties was first class mail or electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, e-mail address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission if listed under the heading "Service by NEF" and the full name and complete postal address for

each party served by mail, is listed under the heading "Service by First-Class Mail".

Service by NEF

Matthew M. Herron
The Debt Doctors, LLC
d/b/a Herron Business Law
607 College Street, Suite 101
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Ronda J. Winnecour
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cmecf@chapter13trusteewdpa.com

Office of the United States Trustee
1000 Liberty Avenue
Suite 1316
Pittsburgh, PA 15222
ustpreion03.pi.ecf@usdoj.gov

Dated: April 30, 2024

Served by First Class Mail

Carrie A. Edwards
Jason D. Edwards
1735 Highland Ave
West Mifflin, PA 15122

Respectfully submitted,

Orlans PC

/s/

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Counsel for Ally Bank Lease Trust - Assignor
to Vehicle Asset Universal Leasing Trust
(a.k.a. "VAULT TRUST", or "V.A.U.L.
Trust", or "VAULT", or "V.A.U.L.T.")